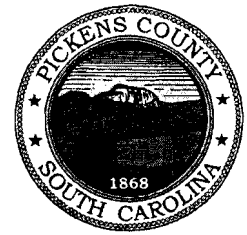


COUNTY OF PICKENS

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J. Chappell Hurst, Jr.
CLERK TO COUNCIL
Donna F. Owen

December 18, 2008

Ms. Renee Baecker
Division of Air Planning, Development & Outreach
Bureau of Air Quality
2600 Bull Street
Columbia SC 29201

Re: Non-attainment Boundaries

Dear Ms. Baecker:

Pickens County is currently struggling with the issue of air quality. The concerns that we face as a county in regards to this matter include our location, population and potential pollutants. We hope that the EPA and SCDHEC will take these concerns under advisement when determining non-attainment boundaries.

We are a rural county nestled at the foot of the Blue Ridge Mountains. These mountains form a barrier around our county that tends to block air flow. Most of our air travels up from the Atlanta metro area and we may also receive pollution from Charlotte if conditions are right.

Growth has started to trickle into the southeastern part of our county from Greenville County. Because of this growth primarily in the Easley area, we are typically coupled with Greenville County. This places Pickens County in an unfair position many times. As a result, we would prefer that we not be included with a larger metropolitan area. According to the US Census the 2007 population estimate for Pickens County is 116,003. The estimate for Greenville County is 428,243 which is considerably larger than Pickens. Greenville County has nearly 195,000 commuters compared to approximately 50,000 in Pickens County. The average commute in both counties is below the national average. The 2000 Census reported a population of 223 persons per square mile in Pickens County. That number is more than doubled in Greenville County to 450. As you can see our populations are vastly different especially in regard to issues that impact air quality.

We feel the air monitor currently located in our county is not a true representation of the entire county in terms of potential pollutants. It is in the southwestern corner of our county only miles from Anderson and Oconee Counties. The current location of the monitor is subject to lake winds. It is close to Interstate 85 which does not run through our county. In fact, we have no interstate highways in our county and only nominal 4 lane state highway traffic compared to the rest of the state. Our industries create minimal air pollutants. We have a seasonal population in the college town of Clemson. Most of these students maintain parked cars and walk or utilize public transportation.

Make no mistake, our concerns in no way minimize our efforts to promote good stewardship of our air quality. We have recently started our own bio-diesel program which will produce 240,000 gallons of bio-diesel for all diesel engines in the county. We are part of a regional group that has submitted an application for funding from the Sustainable Skylines Initiative. During the Spring of 2009, the first tri-county lawnmower exchange sponsored in part by Anderson, Oconee and Pickens Counties will be held.

In conclusion, Pickens County is certainly capable of cooperating within our region with many partners. However, during the process of developing boundaries to define non-attainment areas, we hope that you will consider the differences between Pickens and Greenville counties. These differences may have an impact in certain situations but have a huge influence on air quality regulations. Our hope is that either our county be a considered an area in and of itself or that the more similar counties of Anderson, Oconee and Pickens can form an area.

Thank you for your consideration of this matter. Please do not hesitate to contact me at 864-898-5845 with any questions.

Sincerely,

A handwritten signature in black ink, reading "J. Chappell Hurst, Jr." in a cursive script.

J. Chappell Hurst, Jr.
Administrator